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Plaintiff shall move for a default judgment against the remaining defendants in the three actions or the actions dismissed for failure to prosecute. ORDERED
60/05/2022
JPC

February 14, 2022

VIA ECF

Hon. P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

*Jackie
in all
3 cases*

Re: Mattel, Inc. v. Betterlover, et al., Case No. 18-cv-11644 ("Case I")
Mattel, Inc. v. 2013CheapBuy, et al., Case No. 18-cv-11647 ("Case II")
Mattel, Inc. v. 2012shiningroom2012, et al., Case No. 18-cv-11648 ("Case III")
Letter Requesting to File Motion for Default Judgment

Dear Judge Castel,

We represent Plaintiff Mattel, Inc. ("Plaintiff") in the above-referenced related actions.¹ On February 11, 2022, the Court entered an order, *inter alia*, directing the parties to appear for a Final Pre-Trial Conference on April 12, 2022. ("February 11, 2022 Order"). To date, however, none of the Defendants remaining in any of the above referenced actions have filed Answers or otherwise appeared in this Action, other than Defendant buybeautyproducts, who has failed to retain counsel in accordance with the Court's June 8, 2020 Order. (Case I, Dkt. 143). Plaintiff has not received any indication that any of the Defendants in the above actions intend to appear. Accordingly, all of the Defendants remaining in Case I, Case II and Case III are currently in default, and Plaintiff respectfully requests to file motions for default judgment in each of the actions by no later than April 12, 2022.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Danielle S. Futterman
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¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Complaints or Applications.

Hon. P. Kevin Castel
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